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UNOPPOSED MOTION TO AMEND CASE MANAGEMENT ORDER

Plaintiff moves to amend the case management order and subsequent amendment of the same (ECF 12, 33) and extend discovery deadlines. For good cause shown, the Parties have encountered several discovery disputes which have required assistance from the Court and which has impacted the Parties' ability to conduct discovery and meet corresponding deadlines. Further, lead counsel for Plaintiff encountered a health issue which required some previously scheduled depositions to be postponed and rescheduled. Plaintiff conferred with Defendant about this motion who does not oppose the motion, and Defendant has likewise requested additional time with respect to its expert disclosures, which Plaintiff does not oppose. Accordingly, Plaintiff requests the following deadlines be extended/modified:

Event	Current	Proposed
Close of Discovery	9/3/21	10/1/21
Discovery Motions	10/17/21	10/22/21
Defendant Expert Disclosure	8/6/21	8/31/21
Expert Depos Completed	9/30/21	10/22/21
Dispositive Motions	10/22/21	11/19/21
Trial	4/5/22	--

This motion will not affect the trial date of April 5, 2022, and the proposed dispositive